CHAPTER IV

The Food Stamp Application and Recertification Process

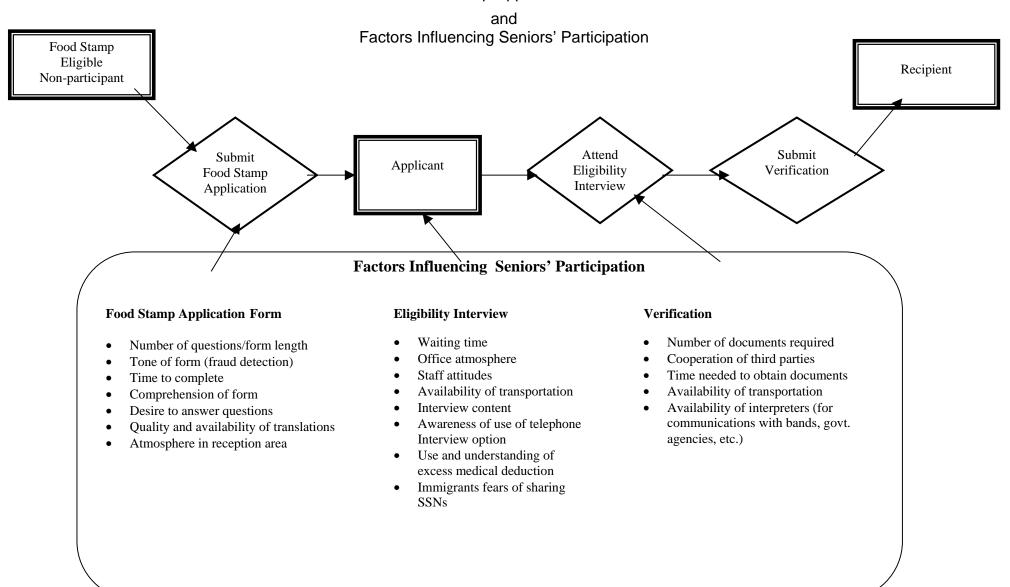
The previous chapter focused on reasons that food stamp eligible seniors hesitate or fail to contact a food stamp office to apply for needed benefits. This chapter presents the focus group findings on the application and recertification processes for food stamps as they are perceived by participants and eligible nonparticipants, and those who work with seniors at the food stamp office and in the community.

The organization of the findings in this chapter correspond to the sequence of steps someone must take to apply for food stamps. Figure IV-1 illustrates the three basic steps involved in the FSP application process nationwide: 1) formal submission ("filing") of a food stamp application form, 2) the eligibility interview, and 3) submission of required verification documents. The possible factors that may influence seniors' decisions to continue the process are listed in the diagram.

Section A of this chapter explores the FSP application process for seniors in more detail to discuss how the factors listed above may affect seniors' decisions to move through the process. Section B explores issues related to reporting and recertification requirements for participating seniors that may affect their decision to continue receiving food stamps. Section C provides specific examples of how FSP program operations and policies have caused some eligible seniors to leave the program.

Figure IV-1.

The Food Stamp Application Process



A. The Food Stamp Application Process

1. The Application Form

The first formal step in the food stamp application process is the submission of the application form. When asked about seniors' experiences trying to apply for food stamps, there was extensive discussion among seniors and the representatives from community-based organizations about the food stamp application form. When probed about the application form, seniors had much to say about its length, complexity, and types of questions asked.

Because the issues raised by the non-English- speaking groups differed somewhat from the English-speaking groups, the analysis of the comments from these two groups are presented separately below.

a. The English Version

English-speaking seniors talked most about the form being too long and having too many seemingly irrelevant questions. A few also indicated that the form seemed to be designed to make them feel ashamed about applying for food stamps.

"They ask you these questions that make you feel guilty. They make you feel like a criminal. The questions they ask on the form make me feel like I was taking something I shouldn't have taken. But I wanted and needed the help." (Seattle nonparticipant)

"The application is very long and there are a lot of unnecessary questions for the elderly." (Seattle nonparticipant)

"If you have no income, the form asks why? Maybe they want to get someone a job. None of those questions about work apply to me." (Seattle participant)

"My problems are different than somebody that has a new baby or a lot of kids. Their problems would be different. Seniors should not have to answer all the same questions that families with kids do." (Seattle participant)

Only one focus group discussant in the English-speaking group of participants said that she did not have difficulty filling out the application form nor problems with its content.

b. The Korean and Spanish Translated Versions

While all non-English-speaking seniors said that the food stamp application form is available to them in their language (Korean or Spanish), the seniors, representatives from CBOs, and some food stamp staff agreed that the translated forms are very difficult to understand, in part because of the quality of the translation and in part due to the reading level of the applicants.

"They probably translate the form too literally. For people to understand the meaning, the whole sentence or whole paragraph needs to be translated, not each word. A word-by-word translation can be very hard to understand, even for me." (Tacoma CBO)

"A lot of the people we work with can't read in their own language so they can't understand the form in whatever language it is written." (Tacoma CBO)

"There is really no way for us to fill that out. I don't have the confidence." (Tacoma participant, translated from Korean)

"There are all these instructions that come with it. There is no way for you to be able to read it." (Tacoma participant, translated from Korean)

"The application form is really hard. It includes too many questions. Even though they get the Spanish version, they still don't understand the questions. The application is full of big words and government language." (Central Washington CBO)

"They usually rely on family members to fill out the form in English. If they don't have family members that can speak English, it's hard for them to fill out the application form." (Central Washington CBO)

2. Seniors' Experience Waiting at the Office

Seniors' comments about the application process focused principally on the atmosphere and treatment they received in the front office when coming in to drop off their application or for a subsequent meeting with a worker. They also complained about the waiting time for their eligibility interview, and the process of the eligibility interview itself. Key findings from these discussions are summarized below.

a. The Atmosphere in the Food Stamp Office

It is clear that many senior discussants from all three population groups have had uncomfortable experiences or fear they would have uncomfortable experiences if they went to the food stamp office, though the participants were much less critical of the office than the nonparticipants and the Korean-speaking participants had the least criticism of the office among all three groups in the study.

Indicating that this view of the office atmosphere is a major barrier to participation, the most disparaging comments about the rude, impersonal nature of the food stamp office staff came from nonparticipants who had attempted to apply in the past.

"Why is it that when you go there you have to talk to workers at those open windows? People sitting behind you can hear your private business and everything you say." (Seattle nonparticipant)

"The staff are very unfeeling and cold." (Seattle nonparticipant)

"I have a feeling that they are just so busy they don't care about anything." (Seattle nonparticipant)

"When one asks for help they are rude. I ask for it, because I need it, not because I want to. There was a lady working with stamps and she was very mean with everybody." (Yakima nonparticipant, translated from Spanish)

"The waiting room is very crowded and they just call you by a number, not your name." (Tacoma nonparticipant, translated from Korean)

Interestingly, a few of the English-speaking seniors (participants and nonparticipants) reported feeling uncomfortable in an office crowded with young children or that the office placed a priority on serving this younger population.

"It isn't very pleasant to see young girls who just had a baby sitting there. It's just uncomfortable." (Seattle participant)

"It seems like the office prefers people with little kids." (Seattle nonparticipant)

Representatives from CBOs had similar views about the uncomfortable experience seniors have in the front area of the food stamp office. One CBO representative from Central Washington also pointed out that seniors applying for food stamps often have to travel far to get to the office. Yet with the additional burden of transportation difficulties and physical limitations, there are no special accommodations for them once they get there.

A few seniors had positive comments about their experience in the waiting room at the food stamp office. Several English-speaking and Spanish-speaking seniors said they considered the DSHS office as a place to meet and interact with others. One senior, who is partially disabled and requires transportation assistance to come to the office, said he enjoys going to the office because he sees people he knows. Another senior said that the wait goes quickly because you can talk to people in the waiting room.

b. Waiting Time in the Front Office

When asked about the office environment and process, seniors in all the discussion groups (the English-speaking, Spanish-speaking and Korean-speaking groups of participants and nonparticipants who had been to the food stamp office to apply) complained about the long waits they experienced when they went to apply and during subsequent visits when they were scheduled for an interview.

"You sign up and get in line with everybody else and sit down for a couple of hours until they get to you. Or sometimes you wait all day and then they tell you to come back the next morning early at 7:00." (Seattle nonparticipant)

"When you go there, there are many people. You have to be there in the morning and wait a long time. And then the staff have lunch hour from 12 p.m. to 1 p.m. and they don't start back until about 2:00 p.m." (Tacoma participant, translated from Korean)

"You usually have to wait there all day." (Pasco nonparticipant, translated from Spanish)

3. The Food Stamp Eligibility Interview

Once the application is received at a local food stamp office, applicants are given (either in person or in writing) the date and time for an eligibility interview and should be informed about the kinds of documents they need to provide to the office to verify the information on their application form. In most of the local offices where the focus groups were conducted, the eligibility interview is scheduled for a future date after the application is received. Most focus group discussants did not raise any concerns or issues with the scheduling of the eligibility interview. A few Korean-speaking participants indicated that the letter they had received to schedule their interview was in English or difficult to understand if translated into Korean.

During the eligibility interview caseworkers are supposed to obtain detailed information regarding the income, resources (e.g., value of vehicles owned, dollar value in bank accounts or other assets), and expenses that can count as income deductions, such as shelter and out-of-pocket medical costs, among others. If the client has brought verification documents to the interview, these are submitted and reviewed at this time.

The focus group discussions about the interview focused on five topic areas: 1) perceptions of workers' attitudes during the interview; 2) views on the content of the interview; 3) the use of the telephone interview option for seniors with hardships; 4) the use of the excess medical

deduction; and 5) special issues facing Korean-speaking and Spanish-speaking seniors. The findings from the analysis of these discussions appear below.

a. Perceptions of Workers' Attitudes During the Interview

Many seniors who were current participants or eligible nonparticipants who had applied for food stamps in the past commented that caseworkers were unfriendly and suspicious.

"The caseworkers are cold. Very unfeeling and cold." (Seattle nonparticipant)

"They want to embarrass you, so you'll get up and walk out." (Seattle nonparticipant)

"They act like it's coming out of their own pocket." (Seattle nonparticipant)

"Everybody's out to steal and everybody's a thief, and that's the way they make you feel..." (Yakima nonparticipant, translated from Spanish)

In response to the concerns of their peers, several of the senior discussants pointed out that the treatment of elderly clients by their workers likely varies by office and worker.

b. Views on the Content of the Interview

Several senior discussants in the English-speaking and Spanish-speaking groups objected to the amount of questions they were asked during the interview and felt that their privacy was being invaded. A few participants suggested that the information being asked at the interview should already be available to the workers from information they had provided when applying for other programs like Social Security or Supplemental Security Income (SSI).

"I got annoyed and mad because they should know everything they are asking. They already have copies from Social Security and the copies of birth certificates I gave them." (Yakima nonparticipant, translated from Spanish)

"We've got to have a little bit of privacy in our lives. The government is getting too much into peoples' private lives." (Seattle participant)

Defending the need to ask for very detailed information from food stamp applicants, several caseworkers blamed this practice on DSHS requirements intended to lower the State's previously high food stamp payment error rate. One caseworker said that workers are being encouraged to ask detailed questions of all food stamp applicants and participants, including the elderly, because their office is being closely audited for errors that could have resulted in overpayments to food stamp participants.

c. The Telephone Interview Option

Recognizing the physical limitations and transportation difficulties facing many elderly in both urban and rural communities, the Food Stamp Act of 1977 requires seniors with hardships to have their eligibility interview conducted over the phone if they request it. Food and Nutrition Service (FNS) regulations effective January 20, 2001 state that the food stamp agency must notify applicants with hardships that they can have a telephone interview or presecheduled athome interview instead of a face-to-face interview in the office. The determination of a hardship can be made on a case-by-case basis State agencies can choose to waive the face-to-face interview in favor of a telephone interview for households with only elderly or disabled members and no earned income. Washington State policy encourages the use of this option to persons with hardships but does not require it.

To learn more about local office practices in the State, discussants in the food stamp office staff groups were asked about the local policies and practices regarding this option. To assess seniors' interest in this option designed to improve their accessibility to the Food Stamp

program, the seniors in the focus groups were asked if they were aware of this option and if they would prefer a telephone interview to the apparent difficulties of getting to the office.⁷

- Food stamp office practices and staff views. In most of the offices in the communities where focus groups were conducted, staff indicated that the office practice is to schedule telephone interviews with seniors who request it. In one office the staff reported that it is not uncommon for the front office staff to suggest a telephone interview to seniors who don't request it if someone else has dropped off their form for them or if they have mailed it in. While all offices are supposed to offer this option to those who request it, the frequency that telephone interviews are utilized varies widely across the three communities involved in the study. In the Pasco office it appears to be a rarely used option. In the Seattle office the staff say that it is commonly used. In the Tacoma office it is commonly used with English-speaking seniors, because a large number of these seniors request it on their application form. Food stamp office staff in Tacoma and Pasco said that it was a rarely used option for non-English-speaking clients. In all three offices, there were mixed opinions as to the relative ease of the telephone interview for workers. Some workers said it was just as easy or difficult as the in-person interview. Others expressed a strong bias against telephone interviews. One staff person said that telephone interviews often have to be rescheduled because seniors do not answer the phone. Several staff in the Tacoma food stamp office focus group said they don't like telephone interviews with non-English-speaking clients because it is very difficult to arrange a telephone interview with both the applicant and the interpreter. One staff person in Pasco, where the option is rarely used, said it is not widely used because caseworkers are required to provide detailed documentation as to why the person could not come into the office for an interview.
- Seniors' views on telephone vs. face-to-face interviews. While seniors do not generally like the atmosphere in the food stamp offices, there were mixed views in all the groups regarding their preference for telephone interviews instead of the in-office interview. This preference was clearly stated by several English-speaking and Korean-speaking discussants. In the Korean-speaking group, one man expressed concern that language would be a greater barrier for him over the phone than in person.

In assessing the senior discussants' views on this policy, it is particularly important to remember that while many of the discussants said they had difficulty obtaining transportation to the food stamp offices, none of the groups included homebound seniors and very few discussants were very impaired physically or mentally. Those with more functional impairments would likely respond differently when asked about their views on the telephone interview option.

"I like the face-to-face. Over the phone it's push this button or push that button. You can't answer a question by pushing a button." (Seattle nonparticipant)

"I prefer face-to-face too. On the telephone, and its not the worker's fault, he or she will be sitting there with a checklist and that's all he or she would want to do is get through this checklist." (Seattle nonparticipant)

"Rather than a phone interview I think its better to go there with an appointment. Because you get so many different calls at home from so many solicitors. I guess understanding the English would also be a big problem (with the phone interview)." (Tacoma nonparticipant, translated from Korean)

Those seniors who did express a preference for the telephone interview option were those with greater physical hardship and those who believed it would be less time consuming and would free them from the hassles and discomfort of having to arrange transportation to the food stamp office.

d. Utilization of the Excess Medical Expense Deduction

The FSP has several special rules for determining eligibility and benefits for households with seniors. First, the elderly and disabled are only subject to a net income test, while other households first have to meet a gross income threshold. (Net income equals gross income minus certain deductions.) The elderly and disabled also have a special deduction for medical expenses that is not available to other groups. Medical costs that exceed \$35 a month may be deducted if the costs were paid directly by the applicant and not covered by insurance or another person. This includes costs for medical bills, prescription drugs, and over-the-counter drugs approved by a physician.

Given the concern expressed by many senior discussants about the high costs of their medications and their increasing need to choose between buying food and paying for medical expenses, along with the low benefit level they think they will get in food stamps, use of the medical expense deduction takes on increasing importance in any effort to increase food stamp participation among the elderly.

Despite the potential importance of this deduction, it is widely believed that many, if not most, elderly applicants are not taking advantage of this deduction. Reasons cited by FNS and by senior advocates are that seniors are not informed of it and that gathering and analyzing the necessary paperwork to document this deduction is difficult for the applicant and worker (FNS, 2000). These assumptions were explored in the focus groups with seniors, food stamp caseworkers, and community-based organizations that help seniors apply for food stamps.

When asked whether they had taken advantage of the medical expense deduction when applying for food stamps, most seniors did not recall being asked to provide information on medical expenses for food stamp eligibility and did not know why it would be relevant to the food stamp application process. The only ones who did recall supplying this information were those who were also applying for Medicaid and had to document their "spend down" of income for future medical expenses in order to qualify for that program. These individuals did not know if the information was ever used to determine their food stamp benefit amount.

Caseworkers noted the difficulty of implementing this deduction and several admitted that while many of the seniors they work with probably do have significant out-of-pocket costs for prescriptions, the workers seldom try to seek the information necessary to calculate the medical deduction because the rules are complicated making it difficult to calculate this deduction accurately. Several workers in the Seattle food stamp office said they do collect this information for seniors on SSI when they are applying for medical insurance coverage and can calculate the excess medical deduction for these households easily. However, since they are not routinely collecting this kind of information for elderly who are not on SSI, some caseworkers said they are likely to overlook the medical deduction for these households.

"The medical expense deduction is an area that you don't deal with all the time and so workers tend to forget to ask if they have out of pocket medical expenses which could increase their food stamp benefit level. It's just something that's overlooked. The rules are very complicated." (Pasco food stamp worker)

"For elderly receiving SSI they do get this information, but this is only a portion of the elderly who apply for food stamps." (Seattle food stamp worker)

One food stamp worker also suggested that workers do not implement the medical expense deduction because it is a huge potential source of errors in food stamp calculations. Since workers routinely have their cases audited for errors, they may choose to shy away from asking questions about medical expenses because they feel the deduction is difficult to calculate and document.

Representatives from KWA, which routinely assists the Korean-speaking elderly in the Tacoma area with the food stamp application process, said they have helped only a few seniors get the excess medical deduction because it is so difficult to get the needed documentation from their clients.

"It's a nuisance trying to claim the deduction, because if you want to you have to come up with the records. And some of the seniors don't keep records, or their records are not organized in one place." (Tacoma CBO)

4. Barriers Non-English-speaking Seniors Face in Completing the Application Process

During the focus groups, several food stamp workers and community-based organizations said that many seniors they work with often begin but do not complete the food stamp application process, even though they are likely eligible. One primary reason for this may reside in the complexity and availability of interpretation services. The second important, though less commonly raised, reason was the fear that legal immigrants have in sharing their Social Security Numbers.

a. Interpretation Services

The DSHS in Washington State requires local food stamp offices to have an interpreter available at the interview if someone needs help. The interpreter can be present at the interview or conferenced into the interview through a national telephone translation service administered by AT&T. Some community service offices allow non-English-speaking clients to bring a translator with them to the interview to interpret the caseworker's questions, while most offices have a policy that only a State certified interpreter can translate during the

eligibility interview. When asked about this policy, one office worker explained that requiring certified interpreters assures that the client gets correct information about the FSP requirements.

When the non-English-speaking discussants were asked about the availability of interpretation assistance, most who had experience with these services reported that interpreters were available and they felt that the interpreter was very helpful to them. The availability of interpretation services seemed critical to their decision to apply. One Korean nonparticipant said that in general she is afraid to go out to places unless she is sure that someone there speaks her language.

While Spanish-speaking participants all reported that the local office provided interpreters for them, several of the Spanish-speaking nonparticipants did not know about the availability of interpretation services at the food stamp office.

Interestingly, it was food stamp workers who most frequently said that despite the availability of interpreters, many non-English-speaking seniors who begin the application process do not complete it. The most common reason cited for non-English-speaking seniors not completing the process was the fact that while interpretation services are available, their use can be cumbersome. Workers said assuring interpretation for food stamp applicants is complex for both the client and themselves because it is needed at every stage of the process, is sometimes not available when needed, and they believed that clients sometimes were hesitant to talk about their personal life circumstances with another stranger, who may even know someone in the applicant's community.

"A lot of times it's just hard for them (non-English-speaking seniors) to come to the interview to get \$10-\$20 of food stamps...They are eligible but just because of the time it takes and because there are a lot of other people involved who have to take their time to help them understand the forms and take them around to get verification documents, that's why they don't complete the application process." (Tacoma food stamp worker)

"Oftentimes there are caseworkers who speak English that don't tell the applicant, we have Spanish translation to help you with the interview.' So, they are stuck trying to communicate with the caseworkers...Unless they ask for it specifically, a lot of times the Spanish-speaking applicant doesn't get a translator. These people just don't want to come back to the office again and don't get food stamps though they are eligible." (Central Washington CBO)

"When we get our interpreter for them, we have brought a stranger to the client and they don't feel that comfortable speaking with that person. Then they might not come back. Whereas, if they could choose their own interpreter to bring with them it would allow them more privacy." (Tacoma food stamp worker)

"We have same-day appointments and application processing at our office. When there is a language barrier the person is not able to communicate with the financial workers at the front counter who usually does the one-day processing and the process doesn't work for them." (Tacoma food stamp worker)

The added complexity of the process for non-English-speaking seniors was summarized well by one food stamp worker.

"Non-English elderly, not just Koreans, have difficulty coming to our office. Their children have to take them to (a community organization that speaks their language) where they fill out the application and then the agency has to contact us and send us the application and then we have to schedule an appointment. Then we have to schedule the interpreter for translation. It's just too many steps....At least 80% of Asian, non-English-speaking elderly in Tacoma are not receiving food stamps because of all the time it takes and the many people involved." (Tacoma food stamp worker)

b. Fear of Sharing Social Security Numbers

Focus group discussants who work with legal immigrants in Seattle and Central Washington said that a common reason many seniors begin the process but do not complete it is because they are concerned someone could commit fraud with their Social Security number.

In fact, one woman working at a senior center in Seattle noted that a local agency serving Asian immigrants trains their clients to never give out their Social Security number to people that they don't know.

5. Submission of Verification Documents

The food stamp application process is finished when the applicant provides all supporting documentation requested by the caseworker to verify their household circumstances. The caseworker then determines the household's eligibility and, if eligible, the monthly food stamp benefit amount. After all required documents are provided, the applicant can receive food stamp benefits.

The focus group findings with food stamp participants indicated that the complexity and time involved in getting needed verification documents was a large hassle and very frustrating. In the focus groups with Korean-speaking seniors, several individuals expressed their frustration with these requirements and talked about the added difficulties they faced meeting them because they do not speak English.

"When your apartment landlord is American and the bank person is American, you always have to bring someone with you to translate and that translator has to be provided by me and that's inconvenient." (Tacoma participant, translated from Korean)

"Bank statements were the hardest. I went to the bank and they gave me a letter telling me that I am a customer. Then the food stamp office said that was insufficient. So basically they returned the document to me and I had to fill out another form with the bank and bring somebody with me who could speak English." (Tacoma participant, translated from Korean)

Among several nonparticipants in the Spanish-speaking and Korean-speaking groups who had previously applied for food stamps, the burdensome nature of the verification requirements was the reason they did not complete the application process.

"Last year I applied. I went twice, but each time I met with a worker they kept asking for more and more papers. I just decided not to go back." (Yakima nonparticipant, translated from Spanish)

"Why bother for \$10? When I applied it was too complicated and too cumbersome to go get all the paperwork that the woman asked for. So I just didn't bother." (Tacoma nonparticipant, translated from Korean)

"They asked for a letter from the landlord and he didn't want to give it to me. So I didn't get food stamps." (Yakima nonparticipant, translated from Spanish)

When staff at the local food stamp offices and community-based organizations serving the elderly were asked in the focus groups if (a) the elderly are able to follow through and get the documentation that is required and (b) if this poses a barrier to seniors completing the initial application process, they consistently identified verification requirements as a barrier to food stamp access for the elderly. The staff cited difficulties seniors have getting transportation to the multiple sites where they have to go get forms signed, and additional language barriers for non-English-speaking seniors as reasons the documentation requirements pose a barrier to participation for senior food stamp applicants.

Also of interest was the point made by some local office staff in the Seattle focus groups who said that seniors who purchase and prepare food separately from their children often have difficulty getting verification of this or other help from their family because the children don't want to be involved.

"Mainly the ones that don't have trouble are the ones that live in senior housing...but the ones living with their family, you don't get many of them completing the process. They want to apply but they don't want to involve their children. I think they want to apply on their own so their children won't get and use their food stamps. These elderly who apply have more problems with the process for food stamps." (Seattle food stamp worker)

"If they're living with their children, they don't want to bother or involve them to sign forms or help them. The children say to them, 'It's too much hassle for me.'" (Seattle food stamp worker)

B. Food Stamp Recertification and Reporting Requirements

Because the FSP participation rate has historically been low but relatively steady among seniors and their income is relatively stable, one might assume that participation rates are primarily driven by the number of new seniors who enter the program, not by seniors leaving the program. However, recent quantitative research on food stamp leavers in Illinois indicates that while the elderly turnover is not high, there is more turnover of the eligible elderly than one might expect. The researchers found that four percent of the elderly food stamp caseload turned over in 1997, the same exit rate as for welfare households that year. Of those seniors who left the program, 18 percent of the elderly and disabled said their primary reason for leaving the FSP was due to administrative difficulties once they on the program. More disturbing is the fact that though elderly people who leave the FSP have other sources of income, they typically remain poor and in ill health after they drop off the program (Rangarjan and Gleason, 2001).

The focus group moderator guides were designed to probe participants and nonparticipants who had been enrolled in the FSP in the past about their experiences with the program requirements once on the program. Several issues were raised by seniors and those who work with them regarding ongoing FSP participation requirements. The factors that influenced seniors views of the FSP and their likelihood to continue program participation included: the office policies on the length of the certification period, the use of telephone interviews for recertification, the burdensome and redundant nature of the paperwork and information requested at recertifications, and reporting requirements as they affected working seniors.

1. Length of Certification Period

It was very clear from the focus groups with food stamp workers in the three different regions of Washington that the length of the food stamp certification period for seniors varies from region to region and is shorter for seniors who are working. For example, in one office, the certification period was routinely six months for most food stamp applicants, including seniors; now it is every three months for those who are working. Those seniors whose sole source of income is SSI or another fixed income have longer certification periods, but staff say these are not the majority of their elderly cases. At another office, the staff said the certification period

varies by the individual household's situation and type of income, ranging from three to 12 months for seniors.

2. Availability of Telephone Interview Option at Re-certification

In addition to differing recertification periods, the food stamp workers seem to adopt different policies toward the option of telephone interviews for recertification of seniors. When asked how often the elderly have telephone interviews for recertification in one office, a worker said:

"It depends on the worker. In our office, we were authorized to do phone interviews if we felt comfortable with it. For a lot of my SSI clients that I've had on my caseload for over a year, I mail them a letter with the forms needed and they send it back. Then I will do a phone interview if everything's pretty much the same and I have all their verification." (Tacoma food stamp worker)

In another office, the workers say they tell seniors that they can recertify by telephone once they see that someone is in poor health. When asked if the appointment letter for the recertification interview that is sent to seniors informs them of this option, the staff in one office did not know. In another office they said the information on this option was no longer on the computer generated letter that goes to participants when their certification period is coming to an end. According to caseworkers, clients can be and some are notified of the telephone interview option in their re-certification notice, if a caseworker determines their client needs to be offered this option and the worker adds a note to the letter before it is automatically printed from the computer.

3. Burdensome and Redundant Nature of The Paperwork and Information Requested at Recertification

Several seniors and representatives from the CBOs also complained that the recertification process was burdensome and redundant for non-working seniors on fixed incomes. Frequent recertifications require seniors to report much of the same information and obtain many of the same verification documents that were provided at the time of initial application.

"I have a person (at KWA) who helps me fill out the forms. But, if they ask me to do it myself, well I don't think I would do it because it's just too bothersome and too cumbersome." (Tacoma participant, translated from Korean)

"But when you reapply, like I said, I have to reapply every 6 months so I have to actually go to the apartment manager or landlord and ask them for actual paper that I reside there and that's very difficult." (Tacoma participant, translated from Korean)

"They send out a paper every three months. What I don't like is that it's the same thing. What is the system, that you always get asked the same thing over and over again?" (Pasco participant, translated from Spanish)

"They'll go through the whole application process initially and then three, six months later, they'll go through the thing all over again ... and their circumstances aren't changing but they have to do this dance and it involves filling out the six page application again and the four supplemental sheets..." (Seattle CBO)

4. Reporting Requirements for Working Seniors

Different from assumptions about the primary sources of income for seniors in general, many of the Spanish and Korean elderly immigrants in the focus groups were working and not receiving Social Security income or very little of it. Hence, issues related to working FSP participants were also affecting seniors in these populations.

Working seniors, who are usually required to come in and recertify every three months in Washington State, complained not only about the frequency of the recertifications but also their requirement to report only minor fluctuations in their income and that these might make them ineligible for food stamps from one month to the next.

"People work a bit with the bare minimum wage per month...Some months you have more hours of work and some you have less hours of working. Just because you have more hours of working they just cut you off and then next month you have to reapply. I really wish they wouldn't do that." (Tacoma participant, translated from Korean)

One man said he had considered giving up his job in order to ensure the stability of the food stamp benefit.

"You are working not so much for the income, but for your health too. So maybe you are thinking you just quit everything and depend on welfare." (Tacoma participant, translated from Korean)

A discussant in the Central Washington CBO focus group said that the fluctuations in income for seasonal farmworkers in Central Washington make it hard for them to stay on the FSP even though they are still in need.

"A lot of the Hispanics, you know, are seasonal workers and they might work three to five months out of the year, but it seems they always get their recertification notice at the time that they're working. They don't take into consideration that those five months of income need to be spread out throughout the whole year...But they don't qualify (because the five months of income is assumed to continue for the entire year)." (Central Washington CBO)

C. Reasons Some Eligible Elderly Participants Leave the FSP

Similar to the analysis of why some eligible elderly do not complete the application process, the focus group discussions indicated that some portion of seniors are leaving the program while likely still eligible due to what they perceive as burdensome reporting and recertification requirements. Some said that they had left the program because of the verification requirements and other paperwork they had to fill out. Language barriers, lost forms, and the complexity and amount of paperwork required were all mentioned by either seniors or the staff who work with them as reasons some eligible seniors chose not to continue participating in the FSP at recertification.

Workers in one office said that seniors with language barriers have trouble deciphering the appointment notices and if they don't have a family member who regularly keeps up with their mail they miss their recertification appointment and are terminated. Given the complexity of the application process for seniors, it is likely that many eligible seniors choose not to re-enroll after they have been cut off.

Several seniors complained that they had to provide the same documentation forms at each recertification and that they couldn't understand why they had to go through the same process, answer the same questions, and bring in the same paperwork over and over again. Several English- and Spanish-speaking seniors said they left the program while they were still eligible due to the complexity of the paperwork requirements, the repetitive nature of the questions asked, and the failure of the office to help through the process.

"When I finally got on food stamps they sent out the form I had to send in every month to tell them how much money I had that month and my medical expenses. I had to send it in and the paper said, 'If you have any questions call your caseworker.' The phone number was on there. I always got a recording and never did in six months get a call back. I called every month. Finally, (at recertification) they dropped my food stamps and I stopped trying to get back on." (Seattle nonparticipant)

"I am not on the program anymore because they send out a form for you to update your application and me having the poor vision, it took me a long time with my magnifying glass to fill out the form. I spent half the day doing it. I filled out the form. I mailed it in and just recently got a notice that they had dropped me from the program because I didn't return the paper. And I did send it in." (Seattle nonparticipant)

"They ask the same questions over and over. If you go twice a week they would ask the same questions." (Yakima nonparticipant, translated from Spanish)

"I got annoyed and mad because they know everything already. They know how many children you have, how much you've worked, how much you earn. They know everything because they have copies from Social Security. You go and they ask the same questions." (Yakima nonparticipant, translated from Spanish)

One Korean-speaking food stamp participant said that while he was still on the FSP, his experience of the complexity of the recertification process compared to the small amount of food stamps he received was making him consider foregoing food stamps completely this time.

"Well I am planning to (recertify), but because the money is so little and the process so complicated, I'm still contemplating whether I should do it or not." (Tacoma participant, translated from Korean)

These complexities of the application and recertification processes, coupled with the special needs of non-English-speaking seniors, are the major reasons why many eligible elderly do not complete the application process, or drop off the program while still eligible. The next chapter addresses some of the challenges posed to seniors who do complete the application process and remain on the program, in particular, how these persons handle the receipt of their food benefits using electronic benefits transfer (EBT) cards.